REMARKS

By this amendment, claims 1-6 and 8-41 are pending, in which claims 1-6, 8-21, 23-25, and 29-41 are currently amended. Claim 7 was previously canceled. No new matter is introduced.

The Office Action mailed June 10, 2010 rejected claim 41 under 35 U.S.C. § 101; rejected claims 1-6, 8-33, 40, and 41 as obvious under 35 U.S.C. § 103(a) based on *Jiang et al.* (US 6,741,853) in view of *Hertling et al.* (US 2004/0205117); and rejected claims 34-39 as obvious under 35 U.S.C. § 103(a) based on *Jiang et al.* in view of *Hertling et al.*, and further in view of *Tummala et al.* (US 6,915,345). The rejections are respectfully traversed.

A. Rejection of Claim 41 under 35 U.S.C. § 101

With respect to the 35 U.S.C. § 101 rejection of claim 41, the Office Action alleges that claim 41 is directed to non-statutory subject matter. Applicants respectfully disagree. However, in an effort to expedite prosecution and to reduce issues for potential appeal, Applicants have amended claim 41. Accordingly, withdrawal of the rejection is respectfully requested.

B. Rejection of Claims 1-6, 8-33, 40, and 41 under 35 U.S.C. § 103(a)

With respect to the 35 U.S.C. § 103(a) rejection of independent claims 1, 18, 30, 33, 40, and 41, Applicants respectfully submit that *Jiang et al.* and *Hertling et al.*, taken individually or in combination, fail to disclose or render obvious all of the features of claims 1, 18, 30, 33, 40, and 41. For example, *Jiang et al.* and *Hertling et al.* fail to disclose or render obvious "determine to expose a loosely-coupled interface to a service provision infrastructure for

brokering added-value network services from one or more of the terminals and network systems to the service provision infrastructure, wherein the service provision infrastructure is for use by one or more of the terminals that **hosts network-enabled applications** and that is configured to interface with a second type of network system," as recited in independent claim 1, and as similarly recited in independent claims 18, 30, 33, 40, and 41.

The Office Action, on page 3, alleges that the Wireless Portal Middleware 210 of *Jiang et al.* corresponds to a network service broker that comprises at least one terminal-coupled broker to communicate directly with one or more terminal and an interface for brokering added-value network services from one or more terminals and network systems to a service provision infrastructure. The Office Action also acknowledges that *Jiang et al.* fails to disclose a loosely-coupled interface, but alleges that *Hertling et al.* remedies this deficiency. Applicants respectfully disagree.

First, *Jiang et al.* fails to disclose that the Internet Content Providers 250-260 (the alleged service provision infrastructure) are for use by one or more of the terminals that hosts network-enabled applications. *Jiang et al.* appears to be entirely silent with respect to the hosting of network enabled applications. Second, *Jiang et al.* fails to disclose that the Wireless Portal Middleware 210 brokers added-value network services from the Mobile Stations 240-246 (the alleged one or more terminals) to the Internet Content Providers 250-260 (the alleged service provision infrastructure). *Jiang et al.*, at best, merely discloses that the Wireless Portal Middleware 210 provides users of the Mobile Stations 240-260 with access to information networks (see Jiang et al., col. 7, lines 3-17).

In addition, *Hertling et al.*, which is relied upon solely for an alleged disclosure of usage of a loosely-coupled interface, fails to at least remedy the above discussed deficiencies of *Jiang*

et al. Furthermore, Applicants respectfully submit that the applied references provide no reason why one having ordinary skill in the art would modify the system of *Jiang et al.*, as proposed by the Office Action, but rather the reason on pages 3 and 4 of the Office Action appears to be an opinion, which is unsupported by any facts. *Jiang et al.* merely describes a method and system for providing information to devices in a format preferable to a device type. See *Jiang et al.*, Abstract. *Hertling et al.* does nothing to suggest the introduction of the alleged loosely coupled interface of *Hertling et al.* into such a system of *Jiang et al.* The rationale presented in the Office Action appears to be nothing more than an agglomeration of bits and pieces of the claimed subject matter thrown together through the exercise of impermissible hindsight, without any of the "articulated reasoning with some rational underpinnings" required by the U.S. Supreme Court, *KSR Int'l Co. v. Teleflex, Inc.*, 127 S. Ct. 1727, 82 USPQ2d 1385 (2007). Thus, the Office Action's conclusion of obviousness relies on impermissible hindsight.

Therefore, independent claims 1, 18, 30, 33, 40, and 41 are patentable over *Jiang et al.* and *Hertling et al.* Dependent claims 2-6, 8-17, 31, and 32 also are patentable over *Jiang et al.* and *Hertling et al.*, at least in view of the patentability of independent claims 1, 18, and 30, from which these claims variously depend, as well as for the additional features these claims recite. For example, the combination of *Jiang et al.* and *Hertling et al.* fails to disclose or render obvious determining to access a terminal location service to allow a **location of the terminal** to be provided to the network-enabled application, as recited in claim 11. Accordingly, withdrawal of the rejection is respectfully requested.

C. Rejection of Claims 34-39 under 35 U.S.C. § 103(a)

With respect to the 35 U.S.C. § 103(a) rejection of independent claims 34, 38, and 39, Applicants respectfully submit that *Jiang et al.*, *Hertling et al.*, and *Tummala et al.*, taken individually or in combination, fail to disclose or render obvious all of the features of claims 34, 38, and 39. For example, *Jiang et al.* and *Hertling et al.* fail to disclose or render obvious "determining to facilitate access by the service provision infrastructure to the web services available from the visited network via a loosely-coupled interface of the visited network service broker that is exposed to the service provision infrastructure," as recited in independent claim 34, and as similarly recited in independent claims 38 and 39, for similar reasons as discussed above with respect to independent claims 1, 18, 30, 33, 40, and 41. Furthermore, *Tummala et al.*, which is relied upon solely for an alleged teaching of an authorization voucher, fails to at least remedy the above deficiencies of *Jiang et al.* and *Hertling et al.*

Therefore, independent claims 34, 38, and 39 are patentable over *Jiang et al.*, *Hertling et al.*, and *Tummala et al.* Dependent claims 35-37 also are patentable over *Jiang et al.*, and *Hertling et al.*, and *Tummala et al.*, at least in view of the patentability of independent claim 34 from which these claims depend, as well as for the additional features these claims recite. Accordingly, withdrawal of the rejection is respectfully requested.

Therefore, the present application, as amended, overcomes the rejections of record and is in condition for allowance. Favorable consideration is respectfully requested. If any unresolved issues remain, it is respectfully requested that the Examiner telephone the undersigned attorney at (703) 519-9952 so that such issues may be resolved as expeditiously as possible.

To the extent necessary, a petition for an extension of time under 37 C.F.R. § 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 504213 and please credit any excess fees to such deposit account.

Respectfully Submitted,

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